

BEFORE THE
Federal Communications Commission
WASHINGTON, DC 20554

In the Matter of:)	
)	MM Docket No. 99-325
In-Band / On-Channel Digital)	
Radio Broadcasting Standard NRSC-5)	

**JOINT COMMENTS OF ENTERCOM COMMUNICATIONS CORP., GREATER
MEDIA, INC. AND INFINITY BROADCASTING CORPORATION**

Entercom Communications Corp., Greater Media, Inc. and Infinity Broadcasting Corporation (collectively, the “*Joint Commenters*”), by their attorneys, hereby submit joint comments in response to the Public Notice issued by the Federal Communications Commission’s (“*FCC*” or the “*Commission*”) Media Bureau on June 16, 2005 (the “*Public Notice*”). The Public Notice seeks comment on the National Radio Systems Committee’s (“*NRSC*”) initial digital audio broadcast standard, “In-band/On-channel Digital Radio Broadcasting Standard NRSC-5” (the “*NRSC-5 Standard*”).

The Joint Commenters have long been firm and active supporters of iBiquity’s in-band, on-channel (“*IBOC*”) digital audio broadcasting (“*DAB*”) system and strongly urge the Commission to quickly adopt rules based on the NRSC-5 Standard as the regulatory standard governing DAB operation. Each of the Joint Commenters has evidenced its commitment to DAB by converting many of its stations to include a digital broadcast signal and encourages the Commission to take aggressive action to ensure the expeditious implementation of digital radio.

The NRSC-5 Standard Was Developed Through An Open Process By Leading Digital Broadcasting Technology Experts.

The NRSC's Digital Audio Broadcasting Subcommittee that developed the NRSC-5 Standard is a long-standing technical committee made up of a diverse range of leading manufacturing, broadcasting and government representatives that are eminently qualified to address the complex issues associated with developing a successful digital broadcasting standard. Moreover, in developing the NRSC-5 Standard, the subcommittee employed a process that afforded interested parties a full and fair opportunity to comment on IBOC technology and have their concerns addressed by iBiquity in an open manner. Indeed, the development of the NRSC-5 Standard may represent the most comprehensive evaluation of any technology in the history of radio broadcasting.

Adoption of Rules Based on the NRSC-5 Standard as the Single DAB Technology Will Further the Public Interest.

With broadcasters increasingly bringing their digital signals on-line, the importance of establishing a uniform technological standard at this time has become imperative. As is set forth in the April 2005 NRSC report, the NRSC-5 Standard has undergone extensive evaluation and testing and was designed to permit a smooth transition from analog to digital radio broadcasting. Thus, the FCC's adoption of rules based on the NRSC-5 Standard would expedite the widespread deployment of digital radio service and thereby enable the general public to promptly take advantage of the many benefits that digital radio broadcasting offers.

Further, the FCC's adoption of such rules will create greater certainty in the marketplace by assuring digital receiver manufacturers that their products will be compatible with all AM and FM digital radio broadcasts. Without a uniform digital broadcasting standard, manufacturers would be justifiably hesitant to commit to the full scale production of equipment based on technology that has not received unqualified government approval going forward. Moreover, the

deployment of a single digital broadcasting standard would facilitate its public acceptance by eliminating the possibility that consumers would be unnecessarily confused by the prospect of being forced to choose between competing technologies. In this way, the Commission will further encourage the introduction of high-quality DAB, thus advancing the public interest. The Joint Commenters vigorously support immediate adoption of rules based on the NRSC-5 Standard as such a single regulatory standard.

Adoption of Rules Based on the NRSC-5 Standard Should Not Delay Action On Other Pending DAB Issues.

While the Joint Commenters urge the Commission to adopt rules based on the NRSC-5 Standard in an expeditious manner, the FCC should not delay acting on other pending DAB matters that are ripe for consideration while examining the NRSC-5 Standard. Specifically, the comment cycles associated with the Public Notice seeking comment on digital AM nighttime transmissions¹ and the Further Notice of Proposed Rulemaking and Notice of Inquiry regarding a variety of important issues such as multicasting and datacasting² have both elapsed. The Joint Commenters encourage the Commission to expeditiously act in those proceedings, separately from this inquiry, to adopt rules to permit AM nighttime transmissions, multicasting and datacasting so that the public can receive the full range of benefits digital radio broadcasting can provide.

¹ See Public Notice – *Comment Sought on Use of Digital AM Transmissions During Nighttime Hours*, DA 04-1007 (rel. Apr. 14, 2004).

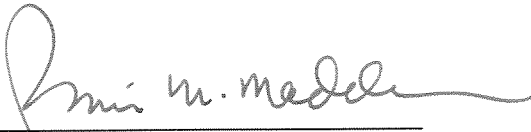
² See Further Notice of Proposed Rulemaking and Notice of Inquiry – *Digital Audio Broadcasting Systems And Their Impact on the Terrestrial Radio Broadcast Service*, MM Docket No. 99-325 (rel. Apr. 20, 2004).

Conclusion.

For the foregoing reasons, the Joint Commenters strongly urge the Commission to expeditiously adopt rules reflecting the NRSC-5 Standard for digital radio broadcasting.

Respectfully submitted,

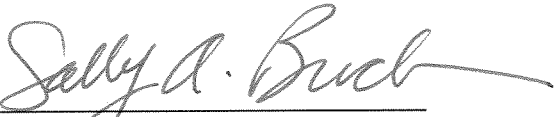
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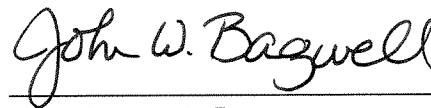
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